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Hon. Kiyo A. Matsumoto USDJ-EDNY 225 Cadman Plaza East Brooklyn, NY 11201

Re: U.S. v. Jonathan Braun, 10 CR 433 (EDNY) (KAM)

Dear Judge Matsumoto:

For the reasons given in his sealed letters of Aug. 13 and 27, 2018, Jonathan Braun opposes Bloomberg News's Nov. 21, 2019 request for blanket unsealing of the papers supporting his 28 U.S.C. § 2255 motion. See ECF No. 180. As previously explained, (1) ; (2) Braun and his family have received threats ; (3) other participants in the case have been killed ; and (4) courts have found these sorts of concerns to constitute a compelling interest justifying restrictions on public access to judicial documents and proceedings. Indeed, the threats against – and harassment of – Braun and his family continue to this very moment, as we are prepared to demonstrate in camera and at any resentencing the Court may order. All that said, we are willing to file appropriately redacted public copies of Braun's motion papers and respectfully await Your Honor's direction in that regard. We appreciate the Court's continued attention and consideration.

Respectfully,
Mark Fernich

cc: AUSA Craig Heeren (email)
All Counsel (ECF-redacted copy only)